

1 THE HONORABLE ROBERT J. BRYAN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 CAMERON LUNDQUIST and LEEANA LARA,
10 on behalf of themselves and all others similarly
situated,

11 Plaintiffs,

12 v.
13 FIRST NATIONAL INSURANCE COMPANY
14 OF AMERICA, LM GENERAL INSURANCE
COMPANY, and CCC INFORMATION
SERVICES INCORPORATED,
15

Defendants.

16
17 No. 3:18-CV-05301-RJB

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
CASE SCHEDULE

NOTE ON MOTION CALENDAR:
OCTOBER 11, 2019

18 Pursuant to Local Rule 7(d)(1), Plaintiffs Cameron Lundquist and Leeana Lara,
19 Defendants First National Insurance Company of America, LM General Insurance Company
20 (“Insurer Defendants”), and Defendant CCC Information Services Inc. (“CCC”), collectively the
“Parties,” hereby stipulate as follows:

- 21 1. The parties have diligently pursued discovery and are in the process of conferring about a
22 number of unresolved discovery requests as well as identifying and producing responsive
23 documents.
- 24 2. The complaint was amended on April 26, 2019 to add CCC Information Services Inc.
25 (“CCC”) as a defendant, thereby necessitating further written discovery and depositions. CCC
26 filed its Answer on June 3, 2019.

1 3. After many weeks of intensive negotiation, Plaintiffs and CCC are also in the process of
 2 finalizing a proposed protective order as well as proposed protocols for the production of
 3 electronically stored information (ESI). Once those documents are filed, Plaintiffs and CCC
 4 expect that substantial completion of production of ESI relating to class certification will take
 5 several weeks.

6 4. Because ESI discovery between Plaintiffs and CCC has only just begun, Plaintiffs and
 7 CCC agree that additional time is needed for written discovery and depositions, including the
 8 production of electronically stored information noted above.

9 5. The current case schedule imposes an October 4, 2019 deadline for Plaintiffs to file their
 10 Motion for Class Certification. Plaintiffs and CCC agree that more time is needed in order to
 11 finalize discovery related class certification issues. While the Insurer Defendants believe
 12 Plaintiffs have had more than enough time to take class related discovery from both the Insurer
 13 Defendants and CCC in order to file their Motion for Class Certification, the Insurer Defendants
 14 do not dispute that CCC was added to the case in the past several months, and as a result, CCC
 15 may need more time to prepare its defense to class certification.

16 Based on the foregoing, the parties stipulate and agree that good cause exists to continue the
 17 case schedule as follows:

Plaintiffs' class certification motion and expert disclosures due	Jan. 31, 2020
Disclosure of any non-certification related expert testimony by Plaintiffs under RFCP 26(a)(2) due	April 15, 2020
All motions related to discovery must be filed by	June 15, 2020
Deposition of Plaintiffs' class certification experts to be completed by	March 31, 2020
Defendants' class certification response and expert disclosures due	March 31, 2020
Fact Discovery completed by	July 31, 2020

1	Deposition of Defendants' class certification experts to be completed by	April 30, 2020
2	Plaintiffs' reply in support of motion for class certification due	April 30, 2020
3	Disclosure of any non-certification related expert testimony by Defendants under RFCP 26(a)(2)	June 15, 2020
4	All dispositive motions must be filed by	Sept. 1, 2020
5	Mediation per CR 39.1(c)(3) held no later than	Jul. 15, 2020
6	Expert Discovery completed by	Aug. 3, 2020
7	Responses to dispositive motions must be filed by	Oct. 1, 2020
8	Replies in support of dispositive motions must be filed by	Oct. 15, 2020
9	Letter of Compliance as to CR 39.1 filed by	Jul. 15, 2020
10	Motions in limine should be filed by	Oct. 30, 2020
11	Agreed pretrial order lodged with the court by	Oct. 30, 2020
12	Trial briefs, proposed voir dire and jury instructions due	Oct. 30, 2020
13	Pretrial Conference will be held at 8:30 a.m. on	Nov. 6, 2020
14	Trial to begin	Nov. 16, 2020

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this _____ day of October, 2019.

ROBERT J. BRYAN
UNITED STATES DISTRICT JUDGE

1 Dated: October 1, 2019

2 s/ Steve W. Berman

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General Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 1, 2019 a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

DATED this 1st day of October, 2019.

s/ Steve W. Berman

Steve W. Berman, WSBA No. 12536